



## THE CITY OF SAN DIEGO

February 10, 2004

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U.S. Fish and Wildlife Service  
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Mr. William E. Tippetts  
Environmental Program Manager  
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South Coast Regional Office  
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**SUBJECT:      RESPONSE TO COMMENTS ON THE DRAFT BLACK MOUNTAIN OPEN  
SPACE PARK NATURAL RESOURCE MANAGEMENT PLAN, IN THE CITY OF  
SAN DIEGO, SAN DIEGO COUNTY, CALIFORNIA (FWS-SDG-1432.10)**

Dear Mr. Bartel and Mr. Tippetts:

Thank you for your comments on the draft *Black Mountain Open Space Park Natural Resource Management Plan* (FWS-SDG-1432.10). We have revised the document based on your input. Included with this letter are a copy of your original comment letter and a revised copy of the document for your review. The following point by point response summary is also provided for your reference in reviewing the changes. Please note that the document was also revised in response to the City of San Diego Park and Recreation staff comments, so some of the document format has been changed slightly. In the responses below, we have included the location of USFWS/CDFG-required revisions in order to assist you in your review.

1. Information has been added to Chapter 1, Section B (Purpose) of the document regarding the biological value of the 325-acre Montana Mirador conservation area and why conservation of the area fulfills Term and Condition 2.1 of the biological opinion 1-6-97-F-13.



### Planning Department

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2. Information has been added to Chapter 1, Section B (Purpose) and within document figures to further describe biological resources within the 325-acre Montana Mirador conservation area. Developing baseline biological data for the entire Park is a Priority 1 task pursuant to the plan (see Chapter 12, Section E, Tasks to be Implemented). Figure 5 delineates biological communities within the entire Park, and habitat acreages (including exotic vegetation) and the 325-acre Montana Mirador conservation area boundary have been added to this figure. Photographic documentation of the 325-acre Montana Mirador conservation area has been included in the document as Appendix E. Detailed information regarding known gnatcatchers on the site is included in the Plan on Figure 8; the 325-acre Montana Mirador conservation area boundary has been added to this figure. Textual information regarding know baseline biological data and the gnatcatcher population within the Park is located in Chapter 3, Section C (Biological Resources, Existing Conditions).
- 3a. The following revisions have been made to the Plan in order to evaluate current and potential threats to sensitive species and habitats and to provide adequate management guidelines specific to the 325-acre Montana Mirador conservation area:

### **Chapter 3, Existing Conditions**

#### E. Land Use and Recreation

- A discussion of the current and proposed land uses in the 325-acre Montana Mirador conservation area has been added Chapter 3, Section E.
- Threats to protected species and habitats from current land uses have been discussed in Chapter 3, Section E.
- A map has been added (Figure 9) detailing sensitive resources within the 325-acre Montana Mirador conservation area. Current land uses depicted in Figure 10. No land uses are proposed in the mitigation area.

#### Figure 8, Land Use

- Due to the inclusion of a new figure based on Park and Recreation's comments, Figure 8 is now Figure 10 and has been revised to black and white format. This figure has been revised to more clearly distinguish the various land uses within and adjacent to the Park. Additionally, the boundary of the 325-acre Montana Mirador conservation area has been added to the figure.



#### F. Management Issues

*Please note that Management Issues, formerly within Chapter 3, is now its own chapter, Chapter 4 pursuant to suggestions made by City Park and Recreation staff.*

- Threats from public use, overuse and urban encroachment have been added to Chapter 4, Sections A (Public Use) and B (Urban Encroachment)
- A discussion of potential impacts to protected species and habitats from the easement has been added to Chapter 4, Section C (Easements).
- Known locations of erosion and sedimentation within the conservation area have been discussed in Chapter 4, Section D (Erosion/Sedimentation).

#### **Chapter 4, Land Use Proposals**

*Please note that Land Use Proposals, formerly Chapter 4, is now Chapter 6 pursuant to suggestions made by City Park and Recreation staff.*

##### Introduction

- The Land Use chapter (Chapter 6) introduction has been revised to note that no development is proposed in this area and all impacts should be avoided.

##### B.1. Habitat Restoration and Enhancement

- It has been clarified in Chapter 6, Section B, that the majority of management area 1 is located within the Montana Mirador conservation area, and trail closure and restoration has been added to the management discussion.
- A management action requiring signs and fencing to preclude public access has been added to the management area 3, 4 and 5 discussions in Chapter 6, Section B.
- A management action requiring exotics removal and habitat restoration has been added to the management area 6 discussion in Chapter 6, Section B.
- Management area 8 has been upgraded to high priority status on both Figure 12 and in Chapter 6, Section B.

##### B.3. Trail Closures and Development

*Please note that Chapter 4, Land Use, is now Chapter 6, and section 3 of the Land Use Chapter is now Section B*

- A paragraph has been added to Chapter 6, Section B, stating that the primary use of the 325-acre Montana Mirador conservation area is the

protection of sensitive species and habitats and that no development or recreational activities should be developed in the conservation area.

- A sentence has been added to Chapter 6, Section B, stating that all unauthorized trails within the conservation area should be identified, closed and restored.
- Unauthorized trails within the Montana Mirador conservation area are discussed in Chapter 6, Section B (management areas) and have been prioritized for closure and restoration based on proximity to sensitive species.
- A paragraph has been added to Chapter 6, Section B, stating that the primary use of the 325-acre Montana Mirador conservation area is the protection of sensitive species and habitats and that no development or recreational activities should be developed in the conservation area.

3b. The following revisions have been made to the Plan in order to specify restrictions to development and activities within the 325-acre Montana Mirador conservation area:  
*Please note that Chapter 5 is now Chapter 7; Chapter 6 is now Chapter 8.*

- Management guidelines that restrict development in the Montana Mirador conservation area have been noted in Chapter 6, Section B; Chapter 7, Sections A and D (#17 in Section D); and Chapter 8, Section C.
- The Chapter 9 introduction has been revised to clarify that any impacts to coastal sage scrub within the Montana Mirador conservation area would require mitigation at a 5:1 ratio.

3c. The following revision has been made to the plan in order to identify and prioritize restoration needs and opportunities within the Park:

- Identification of restoration and enhancement needs has been added to Chapter 10, Section C (#7 and #8). Prioritization of needs is provided in Chapter 6, to which a reference has been added in Chapter 10. Information regarding non-native invasive species has been added, and programs for bullfrog and cowbird management have been added to Chapter 10, Section F.

3d. The following revision has been made to the plan in order to identify and prioritize monitoring needs, and incorporate annual reporting:

*Please note that Chapter 11 has been appended to Chapter 10 as Section D, Specific Management Directives.*

- A monitoring and reporting plan has been added to Chapter 10 that establishes a monitoring plan that includes a schedule for sensitive species surveys, identifies



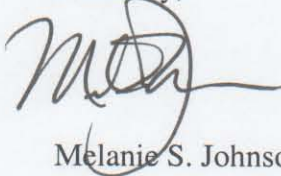
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ecological trends, analyzes management activity effectiveness, and provide new population trend information. It is also noted that all information should be submitted to the Service per BO 1-6-97-F-13. Chapter 12 (Implementation), Section E, has been revised to include updating the Plan every ten years and updating the Park database every three years.

4. As a public agency, the City of San Diego has limited resources to invest in the Property Analysis Record (PAR) software. However, an analysis of Plan implementation and land management costs has been added to Chapter 12, Section C.

Thank you again for your assistance with the *Black Mountain Open Space Park Natural Resource Management Plan*. Please don't hesitate to contact Holly Cheong at (619) 533-6301 or me at (619) 533-6300 if you have any questions about the document.

Sincerely,



Melanie S. Johnson

Associate Planner

Cc: Mary Putnam, San Diego County Water Authority  
Erin Riley, EDAW Inc. (Consultant to County Water Authority)

Enclosures: (1) U.S. Fish and Wildlife Service and California Department of Fish and Game joint letter, *Comments on the draft Black Mountain Open Space Park Natural Resource Management Plan, in the City of San Diego, San Diego County, California* dated December 19, 2002 (FWS-SDG-1432.10)  
(2) Draft *Black Mountain Open Space Park Natural Resource Management Plan*